

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CASE(S)
LISTED ON THE EXHIBIT ATTACHED HERETO:

JOINT MOTION TO DISMISS CERTAIN DEFENDANTS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C. R. Bard, Inc., to the extent they are named as Defendants, advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard (where named) with prejudice in the cases listed on the attached Exhibit A, with each party to bear its own costs.

The settlements in the cases listed on Exhibit A relate only to Bard. Because other Defendant(s) remain in the cases listed on Exhibit A, the case(s) should remain open and Plaintiffs will continue to prosecute their claims against any remaining defendants.

Respectfully submitted this 21st day of November, 2017, by:

/s/ Richard B. North, Jr.

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Attorney for Plaintiffs Listed on Exhibit A

EXHIBIT A – KLINE & SPECTER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-09725	Dalberg, Rebecca and Cornelius
2:14-cv-01386	Whitson, Emily

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Richard B. North, Jr.
Richard B. North, Jr.
Attorney for C.R. Bard, Inc.